

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP,
BI-LEVEL PAP, AND MECHANICAL
VENTILATOR PRODUCTS
LITIGATION

This Document Relates to:

*All Personal Injury and Medical
Monitoring Actions*

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: Master Docket: No. 21-mc-1230-JFC
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: MDL No. 3014
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**KONINKLIJKE PHILIPS N.V.’S MOTION FOR LEAVE TO FILE REPLY
IN FURTHER SUPPORT OF ITS REQUEST FOR JUDICIAL NOTICE**

Pursuant to Rule 4 of the Court’s Pretrial Procedure for Civil Cases, Defendant Koninklijke Philips N.V. (“KPNV”) respectfully requests that this Court grant KPNV leave to file a short, 3-page reply (a copy of which is attached as Exhibit A) in response to Plaintiffs’ Opposition to KPNV’s Request for Judicial Notice (ECF No. 2405). The reason for KPNV’s request is that Plaintiffs offer no proper legal basis to oppose KPNV’s limited request for judicial notice and instead make a separate request to introduce additional deposition testimony into the already closed factual record. KPNV is requesting leave to submit this short reply to respond to Plaintiffs’ improper request.

Dated: January 3, 2024

Respectfully submitted,

/s/ Michael H. Steinberg

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CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2024, the foregoing document was electronically filed with the Clerk of the Court and served upon counsel of record through the Court's ECF filing system.

/s/ Elizabeth N. Olsen
Elizabeth N. Olsen